

From: brynucha@earthlink.net  
Sent: Friday, May 12, 2006 11:02 AM  
To: NOP Livestock  
Subject: Comments on TM-06-06-PR, Dairy Replacement Issue

To: Mark Bradley, NOP

I am an organic dairy farmer in Idaho. I would like to make some comments on the dairy replacement issue. Allowing some dairies to continually transition conventionally raised replacements is a clear double standard and it does something very damaging to the organic dairy industry.

It creates two different groups of organic dairy farmers. Both of the groups have incentives that are naturally exploited to their benefit.

On the one side you have the organic dairy farms that are able to use the loophole to continuously bring conventional animals to their dairy operation.

What is their incentive? It is a tremendous economic advantage to use conventional replacements rather than raise organic ones. So it is natural for them to exploit their economic advantage by selling off organically born calves, and bringing back conventionally raised heifers one year prior to milk production. It is simply a cheaper and much easier way of operating. This is happening now and it is a blatant attempt to exploit a loophole that I don't believe was intended.

On the other side you have the dairy farmers who can't use the loophole. They must raise all of their replacements from last third, using expensive organic milk and feed to raise them.

What is their incentive? Every animal on their farm is devalued by the double standard. Their natural incentive is to go to the consumer and point out the difference between what they are doing and what the first group is doing. It is their only way to recover from their economic disadvantage. They really have no choice but to do this, the double standard makes it necessary. There is no way to compete in such a lopsided environment unless they exploit their economic advantage, just like the first group will do.

I am part of the second group. I don't really like the idea of having to point out the differences in organic milk. The organic label should be the difference, and it would be if there was a level playing field.

I think it is more than just unfair, it is a big mistake to leave the double standard in place and actually provide the incentives that will divide the organic dairy industry. There simply must be a single enforceable standard for all dairy operations regarding where their replacements can come from. Beyond the issues of antibiotics, GMOs, and everything else in conventionally raised animals, you need to think about what economic incentives are given.

You will end up with whatever you give incentives for. I support the last third requirement for

replacements, but it must be applied to everyone. I support whatever steps it takes to remove the double standard. I hope it can be done immediately, if it can't then I support whatever process it takes to change this rule.

Regards,  
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